

REMARKS

Claims 1, 5-12, 15-17 and 20-26 remain pending in the application, claims 2-4, 13, 14, 18 and 19 being canceled herein.

No new issues are raised, nor is further search required as a result of the amendments. It is therefore respectfully requested that the amendment be entered.

Claims 1-26 over Watters, Fisher, Schipper and Green

In the Office Action, claims 1-7, 23, 25 and 26 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Pat. No. 5,982,324 to Watters et al. ("Watters") in view of U.S. Pat. No. 6,295,455 to Fisher et al. ("Fisher"); claims 8-10, 13-15, 18-22 and 24 were rejected under 35 USC 103(a) as allegedly being obvious over Watters in view of Fisher and U.S. Pat. No. 5,986,603 to Schipper ("Schipper"); and the remaining claims 11, 12, 16 and 17 were rejected under 35 USC 103(a) as allegedly being obvious over Watters in view of Fisher, Schipper and U.S. Pat. No. 5,926,133 to Green Jr. ("Green"). Claims 2-4, 13, 14, 18 and 19 are canceled herein, thereby mooting the rejections pertinent in that regard. Otherwise, the Applicant respectfully traverses the rejections.

It is respectfully submitted that the need to combine as many as FOUR separate references to allegedly obviate certain claims of the present invention is an indication of their NON-obviousness.

Nevertheless, claims 1 and 5-9 recite a local error determination module to determine a local error difference between a raw GPS location determined by a first fixed GPS receiver at a base station, and predetermined exact location coordinates of the first GPS receiver. Claims 10-12 and 15-17 recite a method and apparatus for determining a local GPS error difference based on a difference between a fixed GPS location determined by a fixed GPS receiver, and known exact location coordinates of the fixed GPS receiver. Claims 20-22 recite receiving over a wireless device a local error difference.

Watters discloses a conventional GPS system that utilizes a cellular network to obtain necessary differential GPS error correction data for each

received satellite. However, Watters differential GPS error correction data is used in the determination of the raw GPS location. It is used for each satellite. For instance, look to Watters, in the paragraph bridging cols. 3 to 4, “The DGPS receiver selects the appropriate correction for each satellite that it is tracking, and subtracts the correction from the pseudorange that it has measured.” Watters teaches the conventional GPS system that is accurate at best “in the order of ten meters”, i.e., 30+ FEET! (Watters, col. 3, line 44) (The present invention provides improvements over the conventional 30 foot accuracy to within just a **few** meters.

As is known, it takes at least 4 separate satellites to obtain a single GPS location. The commonality with the language used in the present application is unfortunate. To this end, the Applicant amends all pending claims herein to refer to a local error difference, to clearly distinguish from the differential GPS error correction data obtained (over a cellular phone in Watters) for each of the at least 4 satellites.

Fisher is used by the Examiner to allegedly teach transmitting during a telephone call.

Schipper is used by the Examiner to allegedly teach the use of a location difference comprising a longitude difference and a latitude difference.

Green is used by the Examiner to allegedly teach transmitting location information to a called party during an emergency telephone call. In support of this, the Examiner cites col. 1, lines 26-30 and col. 2, lines 55-60. The first passage in col. 1 refers to an FCC requirement in the US—not to any particular feature of the device disclosed by Green. Moreover, the passage in col. 2 of Green mentions the “possibility” of providing GPS positional information “during an E-911 session”, which is not necessarily during a telephone call as claimed.

Nevertheless, neither Watters, Fisher, Schipper, nor Green disclose, teach or suggest the determination of a local error difference as claimed by all pending claims.

Moreover, claims 1 and 5-9 further recite a combiner to combine the local error difference with a raw GPS location signal determined by a mobile device to provide a location accurate to within a few meters. Claims 10-12 and

15-17 recite a method and apparatus for combining at the handset mobile GPS location and a local GPS error difference to generate highly accurate location information to within a few meters. Claims 20-22 recite combining the local error difference with a raw GPS location of the wireless device to provide a location accurate to within a few meters.

As discussed above, Watters teaches the conventional accuracy provided by the GPS system of 30+ feet. However, as discussed in the background section of the present application, in many situations such as a crowded building, on a crowded street, etc., 10 meter accuracy is insufficient. (Specification, page 2, lines 22-28)

Neither Watters, Fisher, Schipper nor Green disclose, teach or suggest provision of location information accurate to within a few meters as claimed by claims 1, 5-12, 15-17 and 20-22.

Furthermore, claims 1 and 5-9 additionally require a transmitter for transmitting the combined value during a telephone call. Claims 20-22 recite transmitting an accurate location from a wireless device during a telephone call. Claims 23-26 recite a module to output during a telephone call a final GPS location corrected by a local error difference.

The Examiner appears to agree that neither Watters, Fisher, nor Schipper disclose the transmission of accurate location information during a telephone call as claimed by claims 1, 5-9 and 20-26. To cure this significant feature, the Examiner cites a fourth reference, Green, in combination with three others. In particular, the Examiner cites col. 1, lines 26-29; and col. 2, lines 55-61. As discussed above, Schipper does NOT disclose an invention that transmits accurate location information during a telephone call as claimed. At best it teaches the “possibility” of incorporating it during an “E-911 session”, but goes no further. Green does not enable one of ordinary skill in the art of exactly HOW the location information would be transmitted, if at all, during a telephone call.

Moreover, Green teaches AWAY from the use of a GPS receiver at all. For instance, reading further on in the second passage, Green explains that “GPS receivers are relatively expensive, are complicated, consume significant

amounts of power, shortening battery life or require larger batteries, use a weak signal that does not penetrate buildings, and requires reference receivers which are not universally available.

Thus, Green clearly teaches AWAY from the use of a GPS receiver AT ALL. Combination of Green with any of the other references would discourage the use of a GPS receiver at all. Accordingly, it is respectfully submitted that the use of Green to teach any GPS related features is non-sensical and improper.

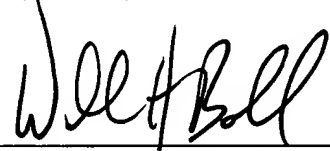
A benefit of outputting corrected location data during a telephone call is, e.g., allowing another party to a telephone conversation to determine a location. Emergency operators typically ask callers of their location. In many circumstances a call party may not know of their exact location. Conventional techniques would not allow an emergency operator to find a person needing assistance. Applicant's invention allows an emergency operator to find a person needing assistance with a very high degree of accuracy, an accuracy not only not disclosed by ANY of the **four** references combined by the Examiner, but not even recognized as being necessary, as is appreciated by the present application.

Accordingly, for at least all the above reasons, claims 1, 5-12, 15-17 and 20-26 are patentable over the prior art of record. It is therefore respectfully requested that the various rejections be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William H. Bollman', written over a horizontal line.

William H. Bollman
Reg. No. 36,457

Manelli Denison & Selter PLLC
2000 M Street, NW
Suite 700
Washington, DC 20036-3307
TEL. (202) 261-1020
FAX. (202) 887-0336